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5 Attorneys for Plaintiff, Nikkei Global Inc.

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 Nikkei Global Inc., a California corporation,

9 Plaintiff,

10 vs.

11 Co-Partner Consortium ("Partner-CO"), a  
12 Nevada general partnership associated in fact  
13 and as an enterprise per 18 USCA § 1961(3);  
14 Mr. Phillip Ziade, Nevada resident and co-  
15 partner; Mr. Jude E. Nassar, an individual  
16 resident of Clark County, Nevada; Appleton  
17 Properties, LLC, a Nevada limited liability  
18 company; Z Leb Group, LLC, a Nevada limited  
19 liability company; Progressive Construction,  
20 Inc. a/k/a Growth Construction, a Nevada  
21 corporation; Growth Development, LLC a/k/a  
22 Growth Construction, a Nevada limited liability  
23 company; Vibrant Realty, LLC, a Nevada  
24 limited liability company; AJ Properties  
International, LLC, a/k/a AJ1, a Nevada limited  
liability company; AJ Properties International  
Series 2 LLC, a/k/a AJ2 a Nevada limited  
liability company; Growth Holdings, a Nevada  
corporation; Growth Luxury Homes, LLC, a/k/a  
GLH, a Nevada limited liability company;  
Growth Luxury Realty, LLC, a/k/a GLR, a  
Nevada limited liability company; Mr. Yoshimi  
Hirooka a resident of Japan or Singapore, doing  
business in Nevada; Mr. Yoshihiro Hirooka, a  
resident of Japan or Singapore doing business  
in Nevada; Hirooka Family Office, Ltd., a  
foreign organization doing business in Nevada,

25 Defendants.

Case No. 2:18-cv-02013-JCM-GWF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
PLAINTIFF, NIKKEI GLOBAL, INC.  
TO RESPOND TO DEFENDANTS  
PHILIPPE ZIADE, JUDE NASSAR,  
APPLETON PROPERTIES, LLC,  
Z LEB GROUP, LLC, PROGRESSIVE  
CONSTRUCTION, INC., GROWTH  
DEVELOPMENT, LLC, VIBRANT  
REALTY, LLC, AJ PROPERTIES  
INTERNATIONAL, LLC,  
AJ PROPERTIES INTERNATIONAL  
SERIES 2, LLC, GROWTH HOLDINGS,  
LLC, GROWTH LUXURY HOMES, LLC,  
AND GROWTH LUXURY REALTY, LLC'S  
MOTION TO DISMISS**

(First Request)

26 Plaintiff Nikkei Global Inc. ("Nikkei"), and Defendants Philippe Ziade, Jude Nassar,  
27 Appleton Properties, LLC, Z Leb Group, LLC, Progressive Construction, Inc., Growth  
28 Development, LLC, Vibrant Realty, LLC, AJ Properties International, LLC, AJ Properties

1 International Series 2, LLC, Growth Holdings, LLC, Growth Luxury Homes, LLC, and Growth  
2 Luxury Realty, LLC (collectively, the “Ziade Defendants”), by and through their respective counsel,  
3 stipulate and agree as follows:

4 1. On October 18, 2018, Nikkei filed its Complaint [ECF No. 1] (the “Complaint”);  
5 2. On November 19, 2018, the Ziade Defendants accepted service of the Complaint.  
6 3. On January 4, 2019, the Ziade Defendants filed their Motion to Dismiss [ECF No. 23]  
7 and served Nikkei with the same.

8 4. At the current time, Nikkei’s Chief Executive Officer and President, Yukiko Minami  
9 (“Minami”) is in Japan attending to her elderly mother who is experiencing a severe health crisis.  
10 Because Minami’s participation is critical to Nikkei’s ability to formulate its Opposition to the Ziade  
11 Defendants’ Motion to Dismiss, Nikkei has requested that its deadline for filing of its Opposition be  
12 extended from January 18, 2019 through and including February 8, 2019.

13 5. Counsel for the Ziade Defendants have graciously agreed to this extension.

14 6. This is the first stipulation to extend the deadline to file a response to the Ziade  
15 Defendants’ Motion to Dismiss. This stipulation is made in good faith and not to delay the  
16 proceedings.

17 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

18 DATED this 15<sup>th</sup> day of January, 2019.

DATED this 15<sup>th</sup> day of January, 2019.

19 WILSON, ELSER, MOSKOWITZ,  
20 EDELMAN & DICKER LLP

BAILEY ♦ KENNEDY

21 By: /s/ Richard I. Dreitzer  
22 RICHARD I DREITZER  
23 Nevada Bar No. 6626  
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25 Las Vegas, NV 89101  
26 Attorneys for Plaintiff Nikkei Global Inc.

By: /s/ Joseph A. Liebman  
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Attorneys for the Ziade Defendants

27 IT IS SO ORDERED.

28   
UNITED STATES DISTRICT COURT

DATED: January 18, 2019